

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

PERIENNE DE JARAY,

Plaintiff,

v.

ATTORNEY GENERAL OF CANADA  
FOR HER MAJESTY THE QUEEN,  
CANADIAN BORDER SERVICES  
AGENCY, GLOBAL AFFAIRS CANADA  
fka DEPARTMENT OF FOREIGN  
AFFAIRS AND INTERNATIONAL  
TRADE CANADA, GEORGE WEBB,  
KEVIN VARGA, and PATRICK LISKA,

Defendants.

No.: 2:16-cv-00571

DECLARATION OF JANIS C.  
PURACAL IN SUPPORT OF  
PLAINTIFF'S MOTION FOR FRCP 16  
STATUS CONFERENCE AND  
PERMISSION TO ENGAGE IN  
DISCOVERY UNDER FRCP 26(f)

I, Janis C. Puracal, hereby declare as follows:

1. I am an attorney with the law firm of Maloney Lauersdorf Reiner, PC, counsel to Plaintiff Perienne de Jaray in this matter. I have personal knowledge of the following facts gained in my capacity as counsel.

2. I attempted to work with counsel for the Defendants to confer under FRCP 26(f) and was unsuccessful. I also attempted to work with counsel for the Defendants to agree on reasonable limitations for preliminary discovery in advance of the Defendants' anticipated motions to dismiss. Counsel for the

1 Defendants insisted that I outline the discovery I believe is necessary to  
2 respond to the motions, but counsel for the Defendants was unwilling to  
3 disclose the basis for those motions. I am unable to narrowly tailor discovery  
4 to meet the Defendants' motions without knowing the basis for those motions.  
5 I believe the parties are at an impasse.

6 3. Attached as Exhibit 1 is a true and correct copy of an email thread  
7 between me and David West, beginning on July 29, 2016, with my attempt to  
8 confer under FRCP 26(f).

9 I declare under penalty of perjury under the laws of the United States  
10 that the foregoing is true and correct to the best of my knowledge, information,  
11 and belief.

12 Dated this 11th day of August, 2016.

13  
14 /s/Janis C. Puracal  
15 Janis C. Puracal, WSBA #39234  
16 E-Mail: jcp@mlrlegalteam.com  
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